

December 10, 2024

By CM/ECF

Hon. Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Courtroom 4F
Brooklyn, New York 11201

**Re: *PleasrDAO v. Shkreli*, Case No. 1:24-cv-04126 – Request to Extend Motion to Dismiss
Briefing Deadlines**

Dear Judge Chen:

We represent Plaintiff PleasrDAO in the above-referenced action. We write, with the consent of Defendant Martin Shkreli, and pursuant to Rule 1(F) of Your Honor's Individual Rules of Practice, to respectfully request an extension of Plaintiff's deadline to file the materials identified in the Court's November 20, 2024 Order necessary for Plaintiff to pursue its contempt motion, including (1) a letter in support of its contempt motion "identifying the specific ways in which it believes Defendant is still in contempt of the Court's Preliminary Injunction Order;" (2) "a list of Plaintiff's exhibits with dated descriptions from the November 20, 2024 hearing;" and (3) "a list of requested additional searches, if any, for Defendant to conduct" (collectively, the "Contempt Motion Materials"). Plaintiff's deadline to file the Contempt Motion Materials is tomorrow, December 11, 2024.

The Parties have met, conferred, and agreed on a list of searches that Defendant will conduct in furtherance of his obligations under the Court's August 26, 2024 preliminary injunction order. Defendant has requested additional time to conduct those searches, and we therefore request an extension of Plaintiff's deadline to file the Contempt Motion Materials until December 20, 2024.

This is the first time the parties have requested an extension of time for these deadlines under Rule 1(F) of Your Honor's Individual Rules of Practice. The extension will not impact any other deadlines set by the Court for this matter.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ Steven Cooper

Steven Cooper

SC:rc